

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Timothy Patrick Higle

Case No. 2:25-mj-30070
Assigned To : Unassigned
Assign. Date : 2/12/2025
Description: CMP SEALED MATTER
(DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 23, 2023 to September 30, 2024 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|----------------------------------|--|
| 18 U.S.C. §§ 2422(b) and 2251(a) | Enticement of a minor and sexual exploitation of a minor |
| 18 U.S.C. § 2252A(a)(2) | Receipt of child pornography |
| 18 U.S.C. § 2252A(a)(5)(B) | Possession of child pornography |

This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.



Complainant's signature

Amy Hirina, Special Agent (FBI)

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 12, 2025

City and state: Detroit, Michigan



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Amy Hirina, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Detroit Division, being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent of the FBI since 2005, and am currently assigned to the FBI Detroit Division, Oakland County, Michigan, Resident Agency. While employed by the FBI, I have investigated federal criminal violations involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute arrest warrants issued under the authority of the United States.

3. I make this affidavit from personal knowledge based on my participation in this investigation, as well as information received from other law enforcement officers and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation.

4. This affidavit is made in support of an application for a criminal complaint and arrest warrant for TIMOTHY PATRICK HIGLE for violations of 18

U.S.C. § 2422(b) (enticement of a minor), 18 U.S.C. § 2251(a) (sexual exploitation of a minor), 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

PROBABLE CAUSE

5. In December 2024, the FBI (Oakland County Resident Agency) was notified of an investigation by the Michigan State Police of a suspect, TIMOTHY PATRICK HIGLE, who was alleged to have solicited minors to produce sexual depictions of themselves for HIGLE, and to have received such sexual depictions from the minors. HIGLE was alleged to have offered and paid money or other consideration to the minors in exchange for producing these sexual depictions.

6. In August 2024, Minor Victim-2 (MV-2) reported HIGLE's conduct to the Michigan State Police. MV-2 stated that HIGLE solicited her for nude images in exchange for money using Snapchat, which she began sending to HIGLE when she was approximately 16 years old. HIGLE also requested sexual images of MV-2 and her friend, Minor Victim-1 (MV-1) when MV-2 was 16 years old and MV-1 was 14 years old. MV-2 and MV-1 sent HIGLE images via Snapchat of them naked in various positions. MV-2 identified HIGLE's CashApp and Snapchat accounts. MV-2 believed that HIGLE paid MV-2's boyfriend at the time for the images using CashApp. HIGLE also sent MV-2 images of his erect penis and of himself masturbating.

7. Also in August 2024, MV-1 was forensically interviewed at a Child Advocacy Center. MV-1 stated that she met HIGLE through MV-2 and that HIGLE also solicited her for nude images in exchange for money using Snapchat. MV-1 received money from HIGLE for sending him nude images of herself. MV-1 recalled taking pictures with MV-2 to send to HIGLE via Snapchat. In their conversations, MV-1 told HIGLE her age. HIGLE asked MV-1 to meet up in his car to do sexual things and HIGLE also sent MV-1 pictures of his penis. MV-1 identified HIGLE's CashApp and Snapchat accounts, and his phone number.

8. Both MV-1 and MV-2 identified HIGLE to law enforcement from HIGLE's profile photo on Facebook.

9. In September 2024, law enforcement obtained subscriber information for HIGLE's Snapchat account timhigle[XX], which showed a display name of "Tim Higle", an email address of timhigle@[redacted].com, and a phone number matching the number provided by MV-1.

10. Also in September 2024, law enforcement obtained data from Apple, Inc. that was associated with the identifiers timhigle@[redacted].com or Timothy Patrick Higle or telephone number XXX-XXX-9484. The depictions described below were among those observed in a review of the data from Apple. At the time of the dates below, MV-2 was 16 years old and MV-1 was 14-15 years old.

| Last Modified Date | Description |
|--------------------|--|
| 03/23/2023 | MV-1 and MV-2 are nude positioned on their hands and knees, with their genitals and anus visible. MV-1 is licking MV-2's face. |
| 03/23/2023 | MV-1 and MV-2 are nude positioned on their backs. Both have their legs spread with their genitals and anus visible. |
| 06/28/2024 | An approximately 9-second video depicting MV-1 removing her clothes until she is fully nude, with her entire body and pubic area exposed to the camera from the front. |
| 06/28/2024 | An approximately 7-second video depicting MV-1 fully nude, spreading her buttocks to expose her anus, and then exposing her nude pubic area |

11. In October 2024, law enforcement obtained subscriber information for HIGLE's CashApp account thigle[XX], which showed an Identity Verification Name of "Timothy Higle", an email of timhigle@[redacted].com, the phone number XXX-XXX-9484, and HIGLE's correct date of birth and social security number.

12. The CashApp information included a transaction on or about March 23, 2023, in which HIGLE sent \$75 to MV-2's boyfriend. HIGLE also made two payments of \$40 and \$10 to MV-1's CashApp account on or about June 28, 2024.

13. Additional review of HIGLE's CashApp and Apple iCloud account identified other minor victims who provided relevant information.

14. In January 2025, MV-3 was forensically interviewed at a Child Advocacy Center. MV-3 advised that she communicated with HIGLE while she was in 7th or 8th grade and she sent HIGLE nude images that he asked for via Snapchat in exchange for money. MV-3 identified herself in redacted images/videos that were obtained from HIGLE's Apple iCloud return. In one video, MV-3 removes all of her clothes until she is standing nude facing the camera with her nude pubic area visible and buttocks exposed. MV-3 was approximately 14 years old at the file's last modified date on the images shown.

15. In January 2025, law enforcement interviewed MV-4. MV-4 stated that HIGLE offered her money to send him sexual images. She started sending HIGLE nude images via Snapchat in her sophomore year and ending in her junior year of high school. HIGLE continually asked MV-4 for images/videos and would tell MV-4 what to send, such as MV-4 spreading her buttocks or making a certain face. HIGLE paid MV-4 money via Cashapp and Venmo in exchange for the nude images. MV-4 identified herself in redacted images/videos that were obtained from HIGLE's Apple iCloud return. In one image, MV-4 is kneeling with her buttocks facing the camera, with her genitalia and anus exposed. MV-4 was approximately 16 to 17 years old at the file's last modified date on the images shown.

16. In January 2025, law enforcement interviewed MV-5. MV-5 stated that HIGLE added her to Snapchat in her freshman or sophomore year of high

school. Almost immediately, HIGLE began offering MV-5 money to send him nude images/videos. MV-5 sent HIGLE nude images/videos of herself for approximately four months in exchange for money, and once for a vape pen cartridge containing THC/marijuana. HIGLE would also send MV-5 nude images of other people and instruct MV-5 to “do this.” MV-5 identified herself in redacted images/videos obtained from HIGLE’s Apple iCloud return. In one image, MV-5 is nude with her pubic area exposed to the camera. MV-5 was approximately 15 to 16 years old at the file’s last modified date on the images shown.

17. In January 2025, law enforcement interviewed MV-6. MV-6 stated that she heard of HIGLE through her friend, MV-5. MV-6 added HIGLE to Snapchat following her 16th birthday. HIGLE began asking MV-6 for photos and MV-6 initially only sent pictures of her face. HIGLE then began offering MV-6 money for nude images/videos of herself. MV-6 sent HIGLE nude images/videos in exchange for money. HIGLE would “direct” MV-6 for what he wanted to see in the images that MV-6 sent. HIGLE paid MV-6 via CashApp and Venmo. MV-6 identified herself in redacted images/videos that were obtained from HIGLE’s Apple iCloud return. In one video, MV-6 is shown nude from the waist down and masturbating with a device. MV-6 was approximately 17 years old at the file’s last modified date on the images shown.

18. At the time of these events, MV-1 through MV-6 were located in the Eastern District of Michigan.

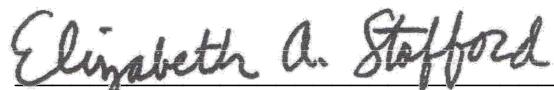
19. Based on the information above, I believe that probable cause exists that TIMOTHY PATRICK HIGLE violated 18 U.S.C. § 2422(b) (enticement of a minor), 18 U.S.C. § 2251(a) (sexual exploitation of a minor), 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,



Amy Hirina
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge